

**INT THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC.,

et. al.,

Plaintiffs,

vs.

ANGELO COLMENERO, in her

Capacity as Interim Attorney

General for the State of Texas

Defendant.

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Civil Action No. 1:23-cv-917

**STATE SENATOR BOB HALL AND STATE REPRESENTATIVE NATE
SCHATZLINE’S MOTION FOR LEAVE TO FILE BRIEF IN OPPOSITION TO
PLAINTIFF’S MOTION FOR EXPEDITED PRELIMINARY INJUNCTION AS
AMICI CURIAE**

COME NOW *Amici Curiae*, State Senator Bob Hall and State Representative Nate Schatzline, and file this *Motion for Leave to File Brief in Opposition to Plaintiff’s Motion for Expedited Preliminary Injunction as Amici Curiae* and would respectfully show as follows:

1. *Amici* State Senator Bob Hall and State Representative Nate Schatzline are elected legislators from the State of Texas, who co-authored and co-sponsored the legislation that is the subject of this lawsuit. As elected officials with a keen awareness of the process through which this legislation came into being, the reasons for its enactment, and a responsibility for the protection of their constituents’ children, *amici* have a distinctive and undeniable interest in the outcome of this case and Plaintiffs’ Motion for Expedited Preliminary Injunction.

2. *Amici* first received actual notice of the August 23, 2023 hearing on Plaintiffs’ Motion for Expedited Preliminary Injunction on August 17, 2023, and – given the expedited nature of its timeline – worked tirelessly to prepare this brief in compliance with the Court’s existing deadline, which is today (August 21, 2023).

3. No party (or counsel for a party) to this lawsuit contributed monetarily or participated in the preparation of the brief that *amici* seek to file.

4. *Amici* respectfully request leave to file the Brief of State Senator Bob Hall and State Representative Nate Schatzline as *Amici Curiae* in Opposition to Plaintiffs' Motion for Expedited Preliminary Injunction, which is attached hereto as Exhibit A.

PRAYER

NOW THEREFORE, State Senator Bob Hall and State Representative Nate Schatzline respectfully request that the Court grant this Motion for Leave and accept the filing of Exhibit A attached hereto as an amicus brief in opposition to Plaintiffs' request for an expedited preliminary injunction.

Respectfully submitted,

Stinson LLP

/s/ Robert E. Farquharson

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CERTIFICATE OF CONFERENCE

I certify that I have attempted to confer with all counsel of record regarding this motion. Despite my attempts, I have been unable to reach lead counsel for Defendant. I have, however, spoken to counsel for Plaintiffs, Scott Cole. Mr. Cole informed me that Plaintiffs are OPPOSED to the present motion.

/s/ Robert E. Farquharson

Robert E. Farquharson

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing document to be served on all parties of record via e-service on this 21st day of August 2023.

/s/ Robert E. Farquharson

Robert E. Farquharson